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MEMO ENDORSED, last page.

July 11, 2022

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Trevor Milton*, S1 21 Cr. 478 (ER)

Dear Judge Ramos:

On behalf of Trevor Milton, I write respectfully to request permission to file under seal Exhibit 2 to the Declaration of Bradley J. Bondi Accompanying Defendant's Motion to Dismiss Count Four of the Superseding Indictment with Respect to So-Called "Lulling" Conduct or, in the Alternative, for a Bill of Particulars ("Bondi Declaration").

Exhibit 2 to the Bondi Declaration is a collection of material produced by the government pursuant to 18 U.S.C. § 3500 that all has been designated "Highly Confidential" in accordance with the August 18, 2021 Protective Order (ECF 14) (the "Protective Order"). The Protective Order requires that neither party "attach any materials designated Highly Confidential pursuant to [the Protective] Order to any public filings with the Court." Protective Order ¶ 7. Accordingly, we respectfully request permission to file Exhibit 2 under seal.

Pursuant Rule 3(ii) of Your Honor's Individual Practices, we will file the unredacted documents under seal on ECF and deliver unredacted copies to Chambers.

CAHILL GORDON & REINDEL LLP

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Respectfully submitted,

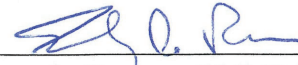
/s/ Bradley J. Bondi

Bradley J. Bondi

cc: Counsel of Record (via ECF)

Milton is granted leave to file Exhibit 2 of the Bondi Declaration under seal. The exhibit must be filed in hard copy with the Clerk's Office, Sealed Records Department.

SO ORDERED.



Edgardo Ramos, U.S.D.J

Dated: 7/15/2022

New York, New York